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May 15, 2025

VIA ECF

Hon. Edgardo Ramos
U.S. District Court for the Southern District of New York
40 Foley Square
Courtroom 619
New York, NY 10007

**Re: *Brous v. Eligo Energy, LLC*, 24 Civ. 1260
Request for an Earlier Hearing Date re: Eligo's Letter-Motion for a Protective Order
(ECF No. 208)**

Dear Judge Ramos:

We represent Defendants in the *Brous v. Eligo Energy* matter (Civ. A. No. 24-1260) and write to request an earlier hearing date for Defendants' letter-motion to quash the depositions of Eligo's co-founders Alex Goldstein and Mark Friedgan. (ECF No. 208.) The hearing is currently scheduled for Tuesday, May 20 at 11a.m., less than 48 hours before Mr. Goldstein's deposition is scheduled to begin in Miami, Florida. Defendants ask the Court to advance the hearing date to Friday, May 16. As background, Mr. Goldstein's deposition would be the sixth of seven depositions scheduled to take place over a 17-day stretch, and an earlier hearing on this letter-motion would allow the parties greater notice to coordinate their preparation and travel logistics both for Mr. Goldstein's deposition and for a deposition that is scheduled to take place the day after Mr. Goldstein's deposition. Plaintiffs take no position regarding Defendants' request for an earlier hearing date.

Respectfully,

/s/ Ryan Watstein
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